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November 14, 2014

Via electronic filing

Honorable Clair C. Cecchi, U.S.D.J.
Martin Luther King Bldg.
50 Walnut Street, Courtroom 2B
Newark, New Jersey 07101

Re: *Jeffrey Rutledge v. Int'l Longshoremen's Assoc., AFL-CIO, et al.*
Civil Action No.: 2:14-cv-05589-CCC-MF

Dear Judge Cecchi:

As Your Honor is aware, my office represents Plaintiff Jeffrey Rutledge in the above-referenced civil action. There is presently pending a Motion to Dismiss Complaint, the notice for which was filed jointly on October 17, 2014 by John P. Sheridan, Esq., counsel for International Longshoremen's Association (ILA), AFL-CIO, ILA Local 1233, and Bernard Dudley (the union defendants); and by James R. Campbell, Esq., counsel for the New York Shipping Association, Inc., Maher Terminals, LLC, and Gerard Crotty (the employer defendants). The original return date was November 17, 2014. By letter filed pursuant to L. Civ. R. 7.1(d)(5), my office requested an automatic extension of the return date to December 1, 2014.

Due to the complexity of the legal issues, and the motion's importance, I would like to request still more time to prepare our brief in opposition to the Defendants' motion. My associate contacted Messrs. Sheridan and Campbell regarding this request. Mr. Campbell advised my associate that he conferred with Mr. Sheridan, and that both attorneys would consent to an adjournment of the motion to December 15, 2014. This would give us until December 1, 2014 to file our opposition brief.

Therefore, pursuant to L. Civ. R. 7.1(d)(5), please accept this letter as my request for an adjournment of the motion to December 15, 2014. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,
Law Office of Randy P. Davenport

By: Randy P. Davenport, Esq. /s/ML
RANDY P. DAVENPORT, ESQ.

RPD/mab